

## **EXHIBIT 7**



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

ANDA 77-083

Food and Drug Administration  
Rockville MD 20857

SEP 13 2005

Barr Laboratories, Inc.  
Attention: Nicholas Tantillo  
2 Quaker Road  
P.O. Box 2900  
Pomona, NY 10970

Dear Sir:

This is in reference to your abbreviated new drug application dated March 9, 2004, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (Act), for Leflunomide Tablets, 10 mg and 20 mg.

Reference is also made to your amendments dated December 29, 2004; and January 11, 2005. We also acknowledge the receipt of your correspondence dated April 26, 2004 addressing patent and exclusivity issues associated with this drug product.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Leflunomide Tablets, 10 mg and 20 mg to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Arava® Tablets, 10 mg, and 20 mg, of Aventis Pharmaceuticals, Inc.). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

The Approved Drug Products with Therapeutic Equivalence Evaluations, the "Orange Book", notes that Aventis Pharmaceuticals, Inc. (Aventis) has exclusivities (I-395\*PED and M-32\*PED) expiring on December 13, 2006 and September 5, 2007, respectively, providing for the use of Arava tablets in the pediatric population. Section 11 of the Best Pharmaceuticals for Children Act (BPCA), signed into law in January 2002, allows certain portions of Aventis' labeling which is subject to pediatric exclusivity protection to be omitted from the labeling of products approved under Section 505(j) of the Act. The BPCA also permits the incorporation of language in the labeling of

products approved under Section 505(j) that informs health care practitioners that Aventis' drug product has been approved for pediatric use. The Agency has determined that the final printed labeling you have submitted is in compliance with the BPCA with respect to pediatric use protected by exclusivity.

Under Section 506A of the Act, certain changes in the conditions described in this abbreviated application require an approved supplemental application before the change may be made.

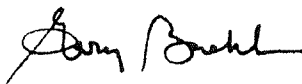
Postmarketing reporting requirements for this abbreviated application are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

Promotional materials may be submitted to FDA for comment prior to publication or dissemination. Please note that these submissions are voluntary. If you desire comments on proposed launch promotional materials with respect to compliance with applicable regulatory requirements, we recommend you submit, in draft or mock-up form, two copies of both the promotional materials and package insert(s) directly to:

Food and Drug Administration  
Division of Drug Marketing, Advertising, and Communications, HFD-42  
5600 Fishers Lane  
Rockville, MD 20857

We call your attention to 21 CFR 314.81(b)(3) which requires that all promotional materials be submitted to the Division of Drug Marketing, Advertising, and Communications (HFD-42) with a completed Form FDA 2253 at the time of their initial use.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Gary Buehler", is written over the typed name.

Gary Buehler  
Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

ANDA 77-084

Food and Drug Administration  
Rockville MD 20857

SEP 13 2005

TEVA Pharmaceuticals USA  
Attention: Philip Erickson  
1090 Horsham Road  
PO Box 1090  
North Wales, PA 19454

Dear Sir:

This is in reference to your abbreviated new drug application (ANDA) dated March 10 2004, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Leflunomide Tablets, 10 mg and 20 mg.

Reference is also made to your amendments dated September 17, October 20, and December 8, 2004; and March 14, April 13, April 26, June 3, June 23, and July 19, 2005.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Leflunomide Tablets, 10 mg and 20 mg to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Arava® Tablets, 10 mg and 20 mg, of Aventis Pharmaceuticals, Inc.). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

The Approved Drug Products with Therapeutic Equivalence Evaluations, the "Orange Book", notes that Aventis Pharmaceuticals, Inc. (Aventis) has exclusivities (I-395\*PED and M-32\*PED) expiring on December 13, 2006 and September 5, 2007, respectively, providing for the use of Arava® in the pediatric population. Section 11 of the Best Pharmaceuticals for Children Act (BPCA), signed into law in January 2002, allows certain portions of Aventis' labeling which is subject to pediatric exclusivity protection to be omitted from the labeling of products approved under Section 505(j) of the Act. The BCPA also permits the incorporation of language in the labeling of products approved under Section 505(j) that informs health care

practitioners that Aventis' drug product has been approved for pediatric use. The Agency has determined that the final printed labeling you have submitted is in compliance with the BCPA with respect to pediatric use protected by exclusivity.

Under Section 506A of the Act, certain changes in the conditions described in this abbreviated application require an approved supplemental application before the change may be made.

Postmarketing reporting requirements for this abbreviated application are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

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Gary Buehler  
Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

ANDA 77-086

Food and Drug Administration  
Rockville MD 20857

SEP 13 2005

Kali Laboratories, Inc.  
Attention: W. Scott Groner  
400 Campus Drive  
Somerset, NJ 08873

Dear Sir:

This is in reference to your abbreviated new drug application dated March 8, 2004, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (Act), for Leflunomide Tablets, 10 mg and 20 mg.

Reference is also made to your amendments dated October 7, November 3 (two amendments), and December 5, 2004 (three amendments); and February 8, March 3, April 22, May 27, and June 9, 2005 (two amendments). We also acknowledge the receipt of your correspondence dated April 19, 2004.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Leflunomide Tablets, 10 mg and 20 mg to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Arava® 10 mg, and 20 mg Tablets, respectively, of Aventis Pharmaceuticals, Inc.). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

The "Orange Book" also notes that Aventis Pharmaceuticals Inc. (Aventis) has exclusivities (I-395\*PED and M-32\*PED) expiring on December 13, 2006 and September 5, 2007, respectively, providing for the use of Arava® in the pediatric population. Section 11 of the Best Pharmaceuticals for Children Act (BPCA), signed into law in January 2002, allows certain portions of Aventis' labeling which is subject to pediatric exclusivity protection to be omitted from the labeling of products approved under Section 505(j) of the Act. The BCPA also permits the incorporation of

language in the labeling of products approved under Section 505(j) that informs health care practitioners that Aventis' drug product has been approved for pediatric use. The agency has determined that the final printed labeling you have submitted is in compliance with the BCPA with respect to pediatric use protected by exclusivity.

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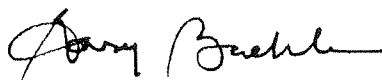
Post-marketing reporting requirements for this abbreviated application are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

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Sincerely yours,

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Gary Buehler  
Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

ANDA 77-087

SEP 13 2005

Food and Drug Administration  
Rockville MD 20857

Santoz, Inc.  
Attention: Beth Brannan  
2555 W. Midway Blvd.  
Broomfield, CO 80038

Dear Madam:

This is in reference to your abbreviated new drug application dated March 9, 2004, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (Act), for Leflunomide Tablets, 10 mg and 20 mg.

Reference is also made to your amendments dated October 8, 2004; February 3, May 26, June 13, July 21, and September 8, 2005.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Leflunomide Tablets, 10 mg and 20 mg to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Arava<sup>™</sup> 10 mg and 20 mg Tablets of Aventis Pharmaceuticals, Inc.). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

The "Orange Book" also notes that Aventis Pharmaceuticals Inc. (Aventis) has exclusivities (I-395\*PED and M-32\*PED) expiring on December 13, 2006 and September 5, 2007, respectively, providing for the use of Arava<sup>®</sup> in the pediatric population. Section 11 of the Best Pharmaceuticals for Children Act (BPCA), signed into law in January 2002, allows certain portions of Aventis' labeling which is subject to pediatric exclusivity protection to be omitted from the labeling of products approved under Section 505(j) of the Act. The BCPA also permits the incorporation of language in the labeling of products approved under Section 505(j) that informs health care practitioners that Aventis' drug product has been approved for pediatric use. The agency has



determined that the final printed labeling you have submitted is in compliance with the BCPA with respect to pediatric use protected by exclusivity.

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Sincerely yours,

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Gary Buehler  
Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

ANDA 77-085

Food and Drug Administration  
Rockville MD 20857

SEP 13 2005

Sandoz, Inc.  
Attention: Enna Krivitsky  
227-15 North Conduit Avenue  
Laurelton, NY 11413

Dear Madam:

This is in reference to your abbreviated new drug application dated March 9, 2004, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (Act), for Leflunomide Tablets, 10 mg and 20 mg.

Reference is also made to your amendments dated July 29, September 23, and December 22, 2004; and January 20, April 8, May 31, June 9, July 21, August 23, and September 8, 2005.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Leflunomide Tablets, 10 mg and 20 mg to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Arava<sup>™</sup> 10 mg and 20 mg Tablets of Aventis Pharmaceuticals, Inc.). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

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Gary Buehler  
Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

ANDA 77-090

Food and Drug Administration  
Rockville MD 20857

SEP 13 2005

Apotex Corp.  
U.S. Agent for Apotex Inc.  
Attention: Kalpesh Shroff  
2400 North Commerce Parkway, Suite 400  
Weston, FL 33326

Dear Sir:

This is in reference to your abbreviated new drug application dated March 9, 2004, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (Act), for Leflunomide Tablets, 10 mg and 20 mg.

Reference is also made to your amendments dated November 8, 2004; and January 19, April 8, April 11, June 16, and June 25, 2005.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Leflunomide Tablets, 10 mg and 20 mg to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Arava® 10 mg and 20 mg of Aventis Pharmaceuticals Inc.). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

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Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research